



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

EPA Region 5 Records Ctr.



321260

105 South Meridian Street
P.O. Box 6015

Indianapolis 46206-6015
Telephone 317/232-8603

August 6, 1990

Ms. Mary E. Oatess, President
The Scientific Edge, Inc.
1304 N. Banner Ave.
Indianapolis, Indiana 46214

Re: McKinley Thompson Landfill
IND980500433

Dear Ms. Oatess:

First, I'd like to apologize for the delay in responding to your inquiries regarding McKinley Thompson Landfill. In response to your May 18, 1990, correspondence, allow me to comment on the site placement in the Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS).

CERCLIS is an inventory system developed by the United States Environmental Protection Agency (U.S. EPA) to track sites that have or are currently being evaluated under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) the site is followed through different stages of investigation; preliminary assessment (PA), site inspection (SI) and Hazard Ranking System (HRS).

A number of mechanisms exist for a facility to be listed, however, once placed in the database, a facility cannot be removed, even after it's been determined that it does not qualify for listing on the National Priorities List (NPL) or even after it's been remediated. As mentioned earlier, CERCLIS is an inventory system of sites evaluated under CERCLA and it's EPA's policy that once listed it remains. The intent of this is so that sites are not duplicated in the system under different names or identification numbers, possibly resulting in additional costs and resources being spent.

The McKinley Thompson Landfill was placed into CERCLIS October 1979. Thus far, the steps completed in the CERCLA process are the PA, completed in September 1984, and an SI completed March 1986.

The actual scoring of the site will not occur until the new HRS model becomes finalized sometime this fall. The development of a new HRS model is required under the reauthorization of CERCLA in 1986.

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The 320 IAC 4 regulations for RCRA have been replaced by 329 IAC 3, effective July 1, 1988. There is not a RCRA "listing" of facilities and their statuses in the above regulations. However, every facility that handles hazardous materials, generating more than 100 kg of waste is required to notify the U.S. EPA. From the facilities notification, a RCRA notifiers list is created.

The status of a facility, when it initiates a Part A application but not the Part B, depends on the content of the original Part A application and any amendments. If the facility claimed any treatment, storage or disposal (TSD) on the Part A, and did not later withdraw or formally close the activity, the activity must be closed in accordance with an approved closure plan. If the only Part A activity was generation, the status remains as such.

On July 11, 1988, IDEM received a letter from Mr. Richard Lane of Lane Restoration (aka McKinley-Thompson Landfill) requesting withdrawal of the Part A permit application. After a review of the facility file, the facility was deemed eligible for an Administrative Change of Status (withdrawal). The status was changed from a TSD facility to a non-handler of hazardous waste.

Regarding the numerous EPA ID numbers, the original notifier number is often separate from the Part A permit application number, because there was some confusion in the early 1980's when the RCRA databases were created. Another number, IND980500433 was assigned to the facility when it became part of the CERCLIS database. It appears that IND980500436 was a typographical error on the U.S. EPA inspection report. The RCRA ID number is IND980590673. This number should also appear on Lane Restoration documents.

As stated earlier, the McKinley Thompson Landfill has reached the HRS stage. However, because the new HRS model has not been finalized and approved, the facility has not been scored. The results provided in the U.S. EPA site inspection report will aid in scoring the facility.

If you have any more questions or need further assistance please contact Ms. Dana Reed Wise at AC 317/232-8930.

Sincerely,

Dana Reed Wise

for

Harry E. Atkinson, Chief
Site Investigation Section
Policy and Planning Branch
Solid and Hazardous Waste Management

DRW/jep